

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

HOSPITALITY INVESTORS TRUST, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 21-10831 (CTG)

(Jointly Administered)

Re: Docket Nos. 7, 8, 50, 109 & 111

**NOTICE OF FILING OF REVISED PROPOSED FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND ORDER (A) APPROVING PREPETITION
SOLICITATION PROCEDURES, (B) APPROVING ADEQUACY OF
DISCLOSURE STATEMENT, AND (C) CONFIRMING JOINT PREPACKAGED
CHAPTER 11 PLAN FOR HOSPITALITY INVESTORS TRUST, INC.,
AND HOSPITALITY INVESTORS TRUST OPERATING PARTNERSHIP, L.P.**

PLEASE TAKE NOTICE that, on May 19, 2021, the above-captioned debtors and debtors in possession (the “Debtors”), filed the *Joint Prepackaged Chapter 11 Plan of Hospitality Investors Trust, Inc., and Hospitality Investors Trust Operating Partnership, L.P.* [Docket No. 7] (including all exhibits, schedules, appendices, and supplements thereto, and as amended, modified, and/or supplemented the “Plan”) and the *Disclosure Statement for Joint Prepackaged Chapter 11 Plan of Hospitality Investors Trust, Inc., and Hospitality Investors Trust Operating Partnership, L.P.* [Docket No. 8] (including all exhibits, schedules, appendices, and supplements thereto, and as amended, modified and/or supplemented from time to time, the “Disclosure Statement”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that, on June 14, 2021, the Debtors filed the *Joint Prepackaged Chapter 11 Plan of Hospitality Investors Trust, Inc., and Hospitality Investors Trust*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Hospitality Investors Trust, Inc. (3668); and Hospitality Investors Trust Operating Partnership, L.P. (0136). The Debtors’ executive offices are located at Park Avenue Tower, 65 East 55th Street, Suite 801, New York, NY 10022.

Operating Partnership, L.P. (Conformed Version) [Docket No. 109] (including all exhibits, schedules, appendices, and supplements thereto, and as amended, modified, and/or supplemented the “Conformed Plan”).

PLEASE TAKE FURTHER NOTICE that on June 14, 2021, the Debtors filed the *Notice of Filing of Proposed Findings of Fact, Conclusions of Law, and Order (A) Approving Prepetition Solicitation Procedures, (B) Approving Adequacy of Disclosure Statement, and (C) Confirming Joint Prepackaged Chapter 11 Plan for Hospitality Investors Trust, Inc., and Hospitality Investors Trust Operating Partnership, L.P.* [Docket No. 111] (the “Proposed Confirmation Order”).

PLEASE TAKE FURTHER NOTICE that, pursuant to the *Order (I) Scheduling and Shortening Notice of, Combined Hearing On Adequacy of Disclosure Statement and Confirmation of Prepackaged Plan; (II) Approving Procedures for Objecting to Disclosure Statement and Prepackaged Plan; (III) Approving Prepetition Solicitation Procedures, Form of Ballot, and Form and Manner of Notice of Commencement, Combined Hearing, and Objection Deadline; (IV) Approving Notice and Objection Procedures for the Assumption of the Executory Contracts and Unexpired Leases; (V) Conditionally (A) Authorizing the United States Trustee to Not Convene Section 341(a) Meeting of Creditors and (B) Waiving Requirement of Filing Schedules and Statements, List of Equity Security Holders, and Rule 2015.3 Reports; and (VI) Granting Related Relief* [Docket No. 50], a hearing has been scheduled before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge, in the Court, located at 824 N. Market Street, 6th Floor, Courtroom 2, Wilmington, Delaware 19801 on **June 23, 2021 at 11:00 a.m. (ET)** to consider confirmation of the Conformed Plan (the “Combined Hearing”).

PLEASE TAKE FURTHER NOTICE that the Debtors have revised the Proposed Confirmation Order (the “Revised Proposed Confirmation Order”) to reflect certain ministerial

and conforming changes arising after the filing of the Proposed Confirmation Order.. A copy of the Revised Proposed Confirmation Order is attached hereto as **Exhibit A**. For the convenience of the Court and interested parties, a redline of the Revised Proposed Confirmation Order compared against the Proposed Confirmation Order is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that the Debtors reserve the right to materially, alter, amend, or modify the Revised Proposed Confirmation Order. The Debtors intend to present the Revised Proposed Confirmation Order to the Court at the Combined Hearing.

Dated: June 22, 2021
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

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